

IV.

At all relevant times, Plaintiff was treated by doctors, nurses, and other medical staff, some of which are unknown to the Plaintiff, all of whom were employed as doctors, nurses and other medical assistants at WBAMC. In doing or omitting to do all of the things alleged herein, the Defendant, and agents of the Defendant, were acting within the course and scope of their employment, and with the permission and consent of the Defendant.

V.

Plaintiff began her gynecologic care at WBAMC on or about September 24, 2014 when she had concerns about a slow healing C-Section incision that had been made on or about September 15, 2014 at a civilian hospital for a cesarian section delivery.

At a clinic visit (AMH F01A Bravo) on October 7, 2014, Plaintiff complained of continuing to have vaginal bleeding and passing clots, since her C-Section.

She was evaluated in the GYN clinic on October 14, 2014 for the bleeding. A dilation and curettage (D & C) was recommended and performed the same day. The procedure note indicated the D & C was ultrasound guided, with 750 cc estimated blood loss.

Post-procedure, she was tachycardic, and was kept overnight and transfused with 2 units packed RBCs. She was discharged on October 15, 2014.

She returned to WBAMC on October 19, 2014 with complaints of fever, chills and gyn related pain. A CT of the abdomen revealed a suspected hematoma in the pelvis from a suspected uterine perforation.

She was taken to surgery on October 20, 2014 for total abdominal hysterectomy. Findings included a uterine perforation at the right posterior cornua and injury to the right broad ligament.

VI.

The Defendant, and the agents of the Defendant, were negligent in one or more of the following:

1. Causing a perforated uterus and injury to the broad ligament during the D & C procedure; and
2. Failing to timely recognize and treat a perforation of the uterus.

VII.

As a direct and proximate result of one or more of the foregoing acts or omissions, Plaintiff suffered the following damages, both past and future:

- a. Physical pain and mental anguish;
- b. Physical impairment; and
- c. Medical expense.

By reason of the foregoing the Plaintiff has been damaged in the sum of FOUR HUNDRED FIFTY THOUSAND DOLLARS (\$450,000.00).

VIII.

Plaintiff's administrative claim was finally denied on October 16, 2017. This lawsuit is filed within six months of that date.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that Defendant be cited and served to appear and answer, and upon final trial of this cause, Plaintiff have judgment against the Defendant in the sum of FOUR HUNDRED FIFTY DOLLARS (\$450,000.00), and for such other and further relief, both general and special, at law and in equity to which Plaintiff may be justly entitled.

Respectfully submitted,

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